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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**MICHELLE HORTON,**

Plaintiff,

vs.

**CASE NO. 2005-72356**

**48<sup>th</sup> DISTRICT COURT for Birmingham,  
Bloomfield Hills, Sylvan Lake, Keego  
Harbor, Orchard Lake Village, and the  
Townships of Bloomfield and West Bloomfield;  
and JAMES P. HARKINS, JR., individually  
and in his official capacity,**

Defendants.

**HONORABLE SEAN F. COX**



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**JURY VERDICT FORM**

We, the Jury, make the following answers to the questions submitted by the Court:

**LIABILITY**

**QUESTION 1**

Did Plaintiff have a legitimate expectation of just cause-only termination?

Answer: YES (yes or no).

If "Yes" answer Questions 2 through 4.

If "No" skip to Question 4.

**QUESTION 2**

Did Defendants have just cause to terminate Plaintiff's employment?

Answer (yes or no): NO

**QUESTION 3**

Were Plaintiff's Due Process rights violated?

Answer (check any that apply):

Yes, Defendants denied her a pre-termination hearing YES

Yes, Defendants denied her a post-termination hearing YES

No, she was afforded both a pre-termination and post-termination hearing \_\_\_\_\_

**QUESTION 4**

Did a Defendant defame Plaintiff?

Answer (check any that apply):

Yes, Defendant Harkins YES

Yes, Defendant 48th District Court YES

No \_\_\_\_\_

**If you answered "No" to Questions 1 AND 4 stop here.  
Sign the verdict form and return to the Clerk.**

## DAMAGES

Only answer Questions 5 through 9 if you answered "Yes" to Question 2, 3 or 4.

### QUESTION 5

What is the total amount of the Plaintiff's damages to present date for lost compensation?

Answer: \$ 55,000

### QUESTION 6 (answer only if you answer "yes" to Question 3 or 4)

What is the total amount of Plaintiff's damages to present date for mental anguish, embarrassment, humiliation, mortification, and damage to professional reputation?

Answer: \$ 250,000

### QUESTION 7

If you find that Plaintiff will incur future damages for lost compensation, give the total amount for each year in which the Plaintiff will incur such loss:

Answer:

For 2007 \$ 29,000

For 2015 \$           

For 2008 \$ 30,000

For 2016 \$           

For 2009 \$ 31,000

For 2017 \$           

For 2010 \$ 32,000

For 2018 \$           

For 2011 \$ 33,000

For 2019 \$           

For 2012 \$ 34,000

For 2020 \$           

For 2013 \$           

For 2021 \$           

For 2014 \$           

For 2022 \$

For 2023 \$ \_\_\_\_\_

Thereafter: \$ \_\_\_\_\_

**QUESTION 8 (answer only if you answer "yes" to question 3 or 4)**

If you find that Plaintiff will incur future damages for mental anguish, embarrassment, humiliation, mortification, and/or damage to professional reputation, give the total amount for each year in which the Plaintiff will incur such loss:

Answer:

For 2007 \$ \_\_\_\_\_

For 2021 \$ \_\_\_\_\_

For 2008 \$ \_\_\_\_\_

For 2022 \$ \_\_\_\_\_

For 2009 \$ \_\_\_\_\_

For 2023 \$ \_\_\_\_\_

For 2010 \$ \_\_\_\_\_

Thereafter: \$ \_\_\_\_\_

For 2011 \$ \_\_\_\_\_

For 2012 \$ \_\_\_\_\_

For 2013 \$ \_\_\_\_\_

For 2014 \$ \_\_\_\_\_

For 2015 \$ \_\_\_\_\_

For 2016 \$ \_\_\_\_\_

For 2017 \$ \_\_\_\_\_

For 2018 \$ \_\_\_\_\_

For 2019 \$ \_\_\_\_\_

For 2020 \$ \_\_\_\_\_

**Question 9**

If you feel that exemplary or punitive damages are appropriate, give the total amount for such damages for the items listed:

Damages against Defendant Harkins for  
violation of Plaintiff's Due Process Rights

\$500,000

Damages against Defendant Harkins for  
defamation

\$500,000

Damages against Defendant 48th District  
Court for defamation

\$1,500,000

**SIGN VERDICT FORM AND RETURN TO CLERK**

SIGNED

s/Jury Foreperson

JURY FOREPERSON

-DATE: December 12, 2006